

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

HOWARD C. LAPENSOHN  
and JILL ABRAMS LAPENSOHN

Plaintiffs,

v.

HUDSON CITY SAVINGS BANK,  
VOYAGER INDEMNITY INSURANCE  
COMPANY and PARKER IBRAHIM &  
BERG,

Defendants.

CIVIL ACTION

No. 2:20-cv-00680-JMG

**STIPULATION FOR EXTENSION OF TIME**

AND NOW this 15<sup>th</sup> day of April 2020, it is hereby STIPULATED and AGREED between counsel for Defendant Voyager Indemnity Insurance Company (“Voyager”), and counsel for Plaintiffs Howard C. Lapensohn and Jill Abrams Lapensohn (“Plaintiffs”), that Voyager shall have a seven (7) day extension of time in which to file its response to Plaintiffs’ Complaint. Good cause exists for the extension because the 2019 novel coronavirus, COVID 19, has delayed regular business operations, necessitating additional time for Voyager to investigate the Complaint and to allow Voyager’s counsel to discuss directly with Plaintiffs’ counsel the substance of Voyager’s contemplated motion to dismiss. This extension will expire on April 24, 2020.

**ROYER COOPER COHEN  
BRAUNFELD LLC**

By: /s/ Matthew Faranda-Diedrich

Matthew Faranda-Diedrich, Esquire  
Alexander J. Nassar, Esquire  
*Attorneys for Defendant Voyager  
Indemnity Insurance Company*

**JOSHUA L. THOMAS & ASSOCIATES**

By: /s/ Joshua L. Thomas

Joshua Louis Thomas, Esquire  
*Attorney for Plaintiffs Howard C.  
Lapensohn and Jill Abrams Lapensohn*

BY THE COURT:

John Gallagher

John M. Gallagher  
United States District Court Judge